

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

LEADERS OF A BEAUTIFUL
STRUGGLE, *et al.*

Plaintiffs,

v.

BALTIMORE POLICE DEPARTMENT,
et al.,

Defendants.

Case No. RDB-20-0929

DEFENDANTS' MOTION TO DISMISS COMPLAINT

Defendants, Baltimore Police Department and Baltimore Police Commissioner Michael Harrison, hereby move to dismiss all claims asserted against them pursuant to Federal Rule of Civil Procedure 12(b)(6) because the Complaint fails to state a claim upon which relief can be granted. Defendants have attached a memorandum of law in support of this motion.

WHEREFORE, Defendants respectfully request that this Honorable Court issue an Order dismissing the Complaint in its entirety with prejudice and without leave to amend.

Respectfully submitted,

Dana P. Moore
ACTING CITY SOLICITOR

/s/
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*Attorneys for BPD and Commissioner
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 12, 2020, a copy of the foregoing Motion to Dismiss, Supporting Memorandum of Law with Exhibit, and Proposed Order, were filed with the United States District Court for the District of Maryland and forwarded to all counsel of record via CM/ECF. A courtesy copy was sent via first-class mail, postage pre-paid, to: United States District Court for the District of Maryland, Attn: Clerk's Office, 101 West Lombard Street, Baltimore, Maryland 21201.

/s/
Kara K. Lynch (29351)